

*Thelma Martin Johnson v. The Kroger Co.*  
*State Court of Fulton County, State of Georgia*  
*Civil Action File Number: 22EV002513*

*Thelma Martin Johnson v. The Kroger Co.*  
*USDC, Northern District, Atlanta Division*  
*Civil Action File Number: TBA (Removal # 1:22-mi-99999)*

## **EXHIBIT A: NOTICE OF REMOVAL**

ALL PLEADINGS, PROCESS, AND ORDERS SERVED  
UPON DEFENDANT THE KROGER CO. IN THE  
STATE COURT OF  
FULTON COUNTY, STATE OF GEORGIA

# General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☒ State Court of Fulton County

**For Clerk Use Only**

**Date Filed** \_\_\_\_\_  
**MM-DD-YYYY**

**Case Number** \_\_\_\_\_

**Plaintiff(s)**

Martin Johnson Theresa

Last	First	Middle I.	Suffix	Prefix
------	-------	-----------	--------	--------

Last	First	Middle I.	Suffix	Prefix
------	-------	-----------	--------	--------

Last	First	Middle I.	Suffix	Prefix
------	-------	-----------	--------	--------

Last	First	Middle I.	Suffix	Prefix
------	-------	-----------	--------	--------

**Defendant(s)**

The Kroger Co.

Last	First	Middle I.	Suffix	Prefix
------	-------	-----------	--------	--------

Last	First	Middle I.	Suffix	Prefix
------	-------	-----------	--------	--------

Last	First	Middle I.	Suffix	Prefix
------	-------	-----------	--------	--------

Last	First	Middle I.	Suffix	Prefix
------	-------	-----------	--------	--------

**Plaintiff's Attorney** Thelma Wyatt Moore **Bar Number** 779300 **Self-Represented** ☐

**Check One Case Type in One Box**

## General Civil Cases

- ☐ Automobile Tort
- ☐ Civil Appeal
- ☐ Contract
- ☐ Garnishment
- ☒ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☐ Other General Civil

## Domestic Relations Cases

- ☐ **Adoption**
- ☐ **Dissolution/Divorce/Separate Maintenance**
- ☐ **Family Violence Petition**
- ☐ **Paternity/Legitimation**
- ☐ **Support – IV-D**
- ☐ **Support – Private (non-IV-D)**
- ☐ **Other Domestic Relations**

### Post-Judgment – Check One Case Type

- ☐ **Contempt**
- ☐ **Non-payment of child support,  
medical support, or alimony**
- ☐ **Modification**
- ☐ **Other/Administrative**

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. \_\_\_\_\_
- Language(s) Required**

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY  
Civil Division

CIVIL ACTION FILE #: \_\_\_\_\_

Theresa Martin Johnson  
 1251 Willis Mills Road SW  
 Atlanta GA 30311  
 Plaintiff's Name, Address, City, State, Zip Code

vs.

The Kroger Co.  
 192 Anderson Street SE, Suite 125  
 Marietta GA 30060  
 Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ 250,000
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input checked="" type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input checked="" type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

**SUMMONS**

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Thelma Wyatt Moore/Moore Law, LLCAddress: 3285 Main StreetCity, State, Zip Code: College Park, Georgia Phone No.: 404-699-6001

An answer to this complaint, which is herewith served upon you, must be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSES MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.

Christopher G. Scott, Chief Clerk (electronic signature)

**SERVICE INFORMATION:**

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

**IN THE STATE COURT OF FULTON COUNTY  
 FOR THE STATE OF GEORGIA**

<b>THERESA MARTIN JOHNSON,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
	)	
<b>v.</b>	)	<b>Civil Action File No.:</b>
	)	
	)	
<b>THE KROGER CO.,</b>	)	
	)	
<b>Defendant.</b>	)	

**ORIGINAL COMPLAINT FOR DAMAGES UNDER O.C.G.A. § 51-3-1**

COMES NOW THERESA MARTIN JOHNSON AS PLAINTIFF, BY AND  
 THROUGH HER attorney, and complains of The Kroger Co. respectfully showing  
 to the Court the following:

**JURISDICTION, VENUE AND CONDITIONS PRECEDENT**

1. Plaintiff is an individual residing at 1251 Willis Mill Road SW, Atlanta, Georgia 30311.
2. Defendant, The Kroger Co. does business at 590 Cascade Road, Atlanta, Georgia, 30310 and is subject to the jurisdiction of this court by service upon its Registered Agent CSC of Cobb County, Inc. at 192 Anderson Street SE, Suite 125, Marietta, GA, 30060, USA.

3. The Defendant may be served through its registered agent for the corporation pursuant to O.C.G.A. § 14-2-504 at the address listed above.
4. The claims herein are brought against The Kroger Co. pursuant to O.C.G.A. § 51-3-1, for money damages for loss of property and personal injuries caused by the negligent and wrongful acts and omissions of The Kroger Co.
5. Venue is proper in that all, or a substantial part of the acts and omissions forming the basis of these claims occurred in Fulton County.

#### **EVENTS FORMING THE BASIS OF CLAIMS**

6. On April 28, 2020, Ms. Theresa Martin Johnson (Plaintiff) was an invitee to purchase groceries at Kroger located at 590 Cascade Road, Atlanta, Georgia, 30310.
7. After shopping, Plaintiff attempted to exit the store, but found carts flipped upside down and blocking the first exit. Ms. Marin Johnson then attempted to use another exit. Unbeknownst to Plaintiff, there was a crack near the metal stripping and water on the floor. She tripped and fell over a large piece of metal stripping. Defendant did not properly maintain the premises including the entry and exit. There was no warning sign. Several shopping carts obstructed the entryway.
8. Ms. Johnson fell on her face and knee, which resulted in profuse bleeding from her mouth.

9. Plaintiff was immediately transported to Piedmont Hospital by ambulance for her injuries.

10. As a proximate result of her tripping and falling over the metal stripping at the entryway to Kroger, Plaintiff received six stitches, underwent a CAT scan, and an X-ray of her knee.

11. Medical doctors at Piedmont Hospital diagnosed Plaintiff with contusion of the right knee, contusion of the right shoulder, and contusion of the face.

12. Damages to Plaintiff's mouth requires reconstruction by a plastic surgeon. Permanent damage to her face will result if not remedied by a plastic surgeon.

13. Plaintiff reported to Peachtree Orthopedics, Emory Healthcare, and dentist James D. Schulte for further treatment.

### **COUNT I – NEGLIGENCE**

14. Negligence is present in this case because each of the four elements of that tort is present and have been met.

15. One, there was a duty. Pursuant to O.C.G.A. § 51-3-1. The Kroger Co. had a duty to keep its premises and approaches safe for Plaintiff an invitee upon the premises for the mutual benefit of the parties.

16. Two, there was a breach of that duty. The Kroger Co. allowed one exit to be totally obstructed by upside down carts blocking the entry/exit. At the second entry/exit, employees left carts strewn about the entryway obstructing the

entryway. The tile on the floor and metal stripping at the entryway to the store was in grave disrepair. The tile was broken and lifted away from the floor of which Defendant had superior knowledge. There was water on the floor. There were no warning signs. Plaintiff had no knowledge as same was not visible to Plaintiff.

17. Three, there was an injury. Plaintiff suffered a busted lip, contusions to her face, shoulder, and knee. Plaintiff required emergency transportation to and treatment at Piedmont Hospital. During transport, the bleeding from Plaintiff continued to suffer bleeding from her mouth.

18. Four, Plaintiff's injury was proximately caused by the chaos of the carts, eroding floor, and wet floor on the premises of the property owned and poorly maintained by Defendant.

19. Five, Plaintiff had to undergo several treatments subjecting her quality of life to great impact.

#### **A. BREACH OF DUTY IN INVITING INVITEE TO THE UNMAINTAINED PREMISES**

20. The Kroger Co. had superior knowledge of the hazardous configuration of the carts. The test of establishing superior knowledge calls for proof that an employee was close to the area of the incident. See *Robinson v. Kroger Co.*, 268 Ga. 735, 736-738 (493 SE2d). At the Kroger on 590 Cascade Road, employees

constantly maneuver all over the premises: in, out, and around the store. An employee or store manager had knowledge of the placement of the carts because the carts were scattered about the entry to the store and purposely stacked upside down to block one of the exits.

21. Further, the owner of the premises is tasked with periodically inspecting the premises for hazards. The cart issue was ongoing. The tile issue was present. Inspection had not occurred and if it did, the employees had not remedied the existing problems.

22. The owner should have removed the hazard for the sake of the safety of the invited public. See *American Multi-Cinema v. Brown*, 285 Ga. 442, 444 (679 SE2d 25) (2009).

**WHEREFORE**, Plaintiff sincerely prays for the following relief:

a) That the Kroger Co. be properly served by serving their registered agent at the following address; and

1. CSC of Cobb County, Inc.  
192 Anderson Street SE, Suite 125  
Marietta, GA, 30060, USA

b) That this matter be heard in the State Court of Fulton County where the events in question occurred; and

- c) That the Court proceed to require The Kroger Co. to respond as provided by law; and
- d) That this Court thoroughly hear the issues set forth herein; and
- e) That this Honorable Court find that The Kroger Co. is liable to Plaintiff in the minimum amount of \$250,000.00 for trauma, injuries, and damages caused by The Kroger Co.'s failure to maintain the premises and approaches in a safe condition for invitees, which resulted in Plaintiff's slip, fall, and her severe emotional and physical injuries; and
- f) That Plaintiff be awarded court costs, and expenses to compensate for the necessity of bringing this lawsuit; and
- g) That the damages sought from The Kroger Co. are as follows:

**COUNT I - Negligence**

**SPECIAL DAMAGES**

***ECONOMIC***

Piedmont Hospital ER	\$ 12,923.29
Peachtree Orthopedics	\$ 530
James D. Schulte DMD PC	\$ 2,335
Grady EMS	\$ TBD
<b>TOTAL ECONOMIC DAMAGES</b>	<b>\$ 15,788.29</b>

***NON-ECONOMIC***

Pain and Suffering	\$	117,105.85
Future Medical Expenses	\$	117,105.85
<b>TOTAL DAMAGES</b>	<b>\$</b>	<b>250,000</b>

Respectfully submitted this 27<sup>th</sup> day of April, 2022.

/s/ Thelma Wyatt Moore  
Thelma Wyatt Moore, Esquire  
Georgia Bar No. 779300  
Attorney for Defendant  
tmoore@moore-legal.com

MOORE LAW, LLC  
3285 Main Street  
College Park, Georgia 30337  
Office: 404-699-6001  
Fax: 866.257.5052

IN THE STATE COURT OF FULTON COUNTY  
FOR THE STATE OF GEORGIA

THERESA MARTIN JOHNSON, )

Plaintiff, )

v. )

Civil Action File No.:

THE KROGER CO., )

Defendant. )

VERIFICATION

I, Theresa Martin Johnson, personally appeared before the undersigned Notary Public, and say under oath that I am the Plaintiff in the above-styled action and that the facts stated in the within and foregoing **ORIGINAL COMPLAINT FOR DAMAGES UNDER O.C.G.A. § 51-3-1** are true and correct.

EXECUTED on this 27 day of April, 2022.

Theresa Martin Johnson  
Theresa Martin Johnson  
Plaintiff

Sworn and subscribed before me,

This 27<sup>th</sup> day of April, 2022

Akure Imes  
NOTARY PUBLIC  
My Commission Expires



## **Exhibit “A”**

**Photo of unrepaired entryway  
tile and metal stripping**



## **Exhibit “B”**

### **Photo of carts obstructing entryway**



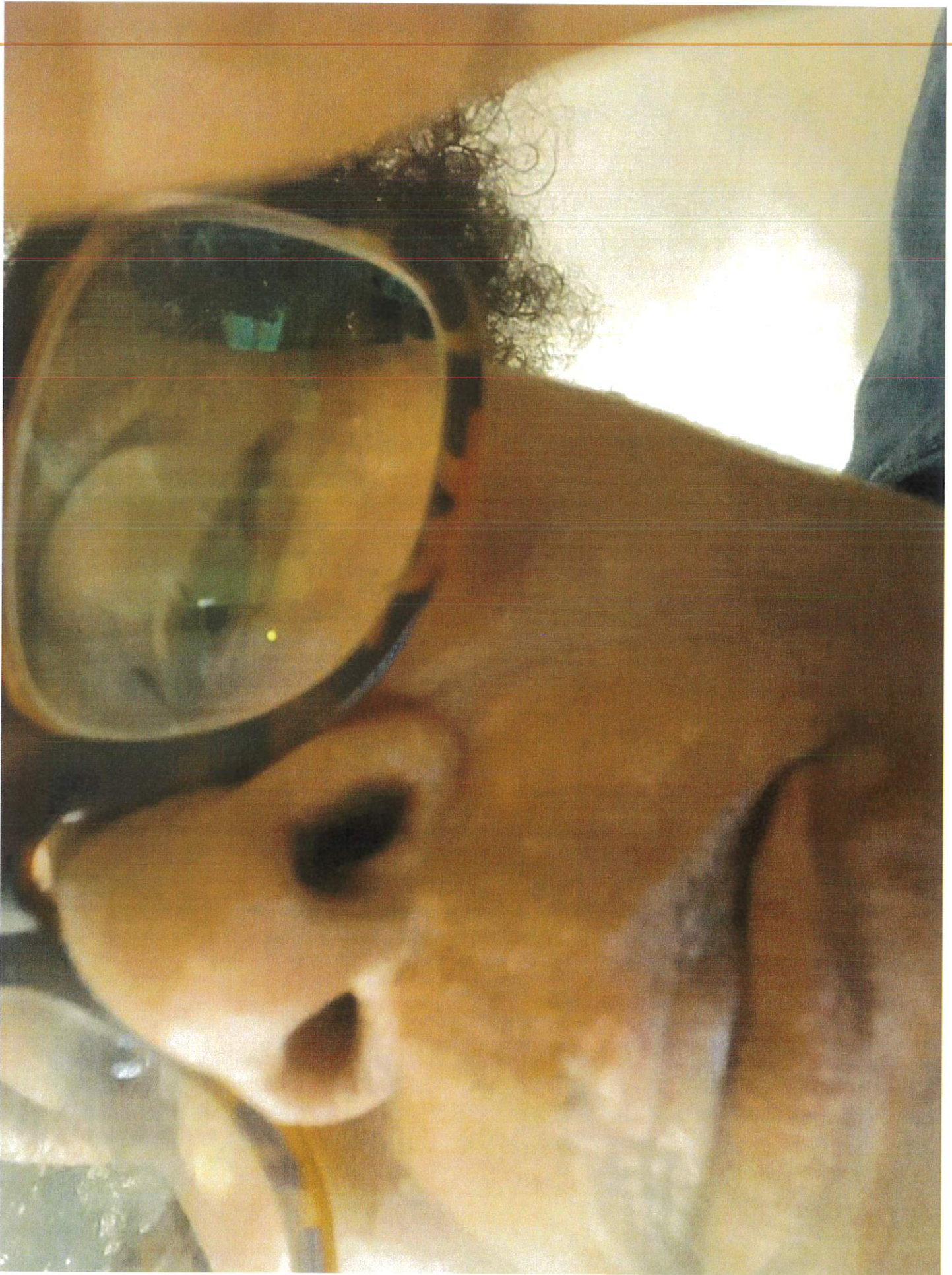
## **Exhibit “C”**

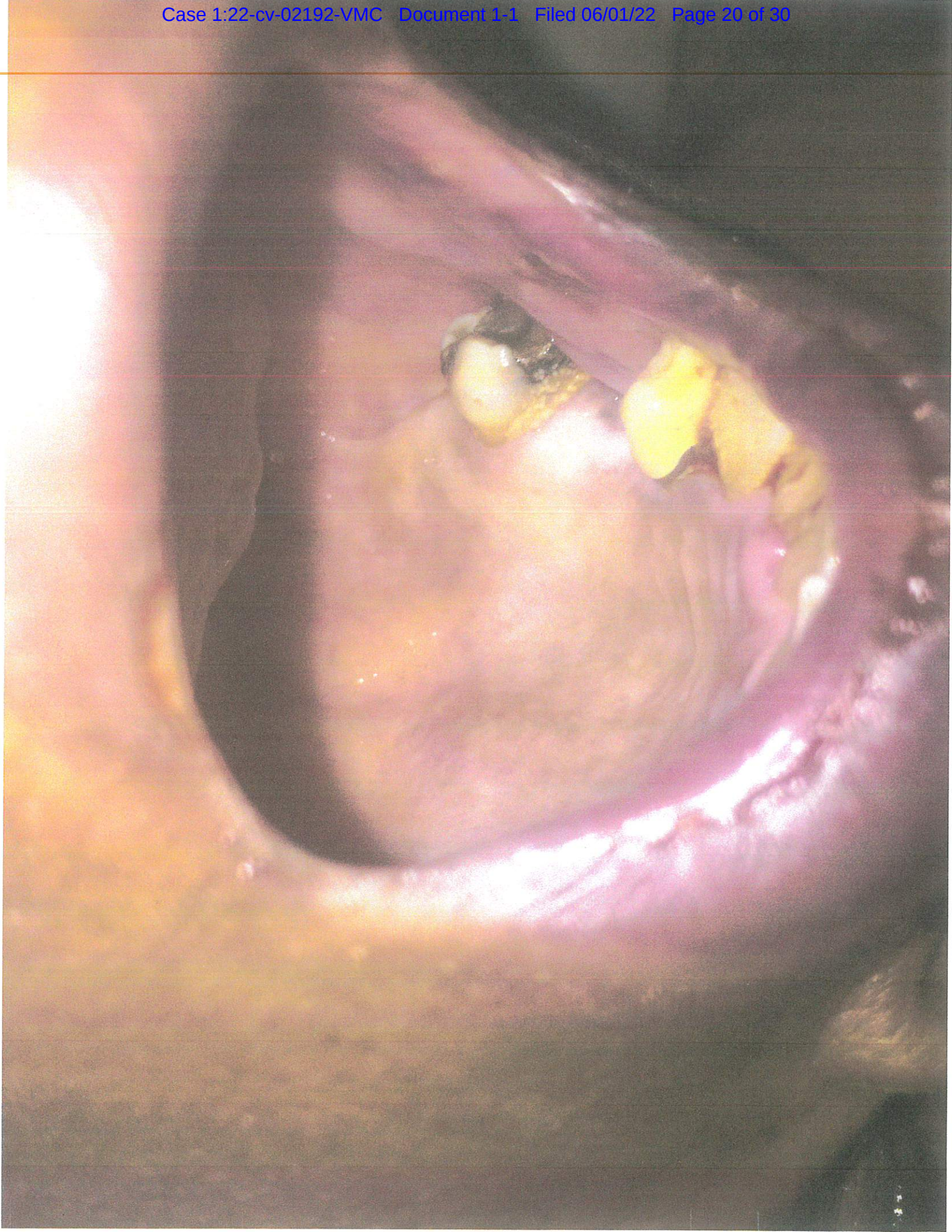
### **Photo of Injuries to Invitee/Plaintiff**

Theresa Martin Johnson v. The Kroger Co.  
CAFN: \_\_\_\_\_  
The Hon. \_\_\_\_\_









## AFFIDAVIT OF SERVICE

Case: 22EV002513	Court: IN THE STATE COURT OF FULTON COUNTY, CIVIL DIVISION	County: FULTON	Job: 7021205
Plaintiff / Petitioner: THERESA MARTIN JOHNSON		Defendant / Respondent: THE KROGER CO.	
Received by: Southeastern Process Servers		For: MOORE LAW LLC	
To be served upon: The Kroger Co.			

I, Rochelle Earthrise, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: The Kroger Co. in c/o their Reg. Agt. CSC of Cobb County, Inc. Terry Thompson accepted service on their behalf., Corporate: 192 Anderson St SE, Marietta, GA 30060

Manner of Service: Registered Agent, May 2, 2022, 11:25 am EDT

Documents: SUMMONS, ORIGINAL COMPLAINT FOR DAMAGES UNDER O.C.G.A. § 51-3-1 (Received Apr 27, 2022 at 3:10pm EDT)

## Additional Comments:

1) Successful Attempt: May 2, 2022, 11:25 am EDT at Corporate: 192 Anderson St SE, Marietta, GA 30060 received by The Kroger Co. in c/o their Reg. Agt. CSC of Cobb County, Inc. Terry Thompson accepted service on their behalf.. Age: 59; Ethnicity: Caucasian; Gender: Female; Weight: 150; Height: 5'3"; Hair: Brown; Eyes: Brown;  
 The Kroger Co. in c/o their Reg. Agt. CSC of Cobb County, Inc. Terry Thompson accepted service on their behalf.

Subscribed and sworn to before me by the affiant who is personally known to me in the state of Georgia, DeKalb county.

Rochelle Earthrise 5/4/2022  
 Rochelle Earthrise  
 ID# CPS 236

Southeastern Process Servers  
 2296 Henderson Mill Rd NE # 116  
 Atlanta, GA 30345  
 404-330-9066

Susan Earthrise  
 Notary Public  
 5/4/2022  
 Date Commission Expires





STATE COURT OF FULTON COUNTY  
 ATLANTA, GEORGIA

IN THE STATE COURT OF FULTON COUNTY  
 STATE OF GEORGIA

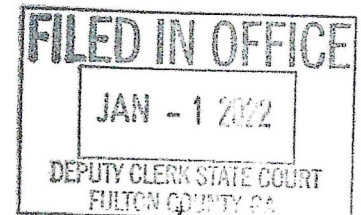
Administrative Order No. 22EX000001

IN RE: ORDER FOR APPOINTMENT FOR SERVICE OF PROCESS

It appearing that the State Court of Fulton County has read and considered petitions and criminal records for the persons listed below, and the same having met certification requirements, this Court hereby allows the same to serve process for State Court proceedings,

IT IS HEREBY ORDERED that the following persons:

ABRAHAM, ROBIN L.	FARKAS, BELA	KING, AMOS	SAXON, ROBIN LEE
ALLEN, LAKEITA TYESHA	FAULKNER, DANA V.	KOTLAR, MICHAEL J.	SAXON-FORD, VIRGINIA
ANDERSON, QAISAR CRAIG	FAZZIO, DEDREA L.	LASTER, BEVERLY L.	SEKLECKI, CHRISTIAN G.
ANDERSON, WILLIAM JAMES	FERGUSON, REGINALD B.	LAUSMAN, MARSHA C.	SHEPHERD, ELIZABETH A.
ANDREWS II, GENE EDWARD	FERRERO, AMY LYNN	LAWSON, ZURI M.	SIBBALD, JOHN WILLIAMS
ARMSTRONG, CHRISTOPHER J.	FISHER, DAWN WALLS	LE, PHUONG-ANH DAO	SINGLETON, WESLEY G.
ARMSTRONG, CYNARA	FITZGERALD, FLORETTA	LETTIS, WILLIAM EARL	SMITH JR., BRUCE RICHARD
BACKO, MUSTAFA	FOGLE, JOHNNY COLVIN	LEWIS, KEVIN JOSEPH	SMITH, DELACIE PAUL
BAILEY, ANNA MARIE	FOLDS, CATHERINA PILAR	LOUIS, CLYDE A.	SMITH, RONALD LEON
BALL, STACY LEIGH	FOLDS, GEORGE LARRY	LUTWACK, WILLIAM C.	SMITH, VIRGINIA E CHARLES
BARNES, KRISTOPHER KEVIN	FORD, RONNIE	MAGGARD, ANDREW M.	SNELLINGS, SHARON E.
BARNEY JR., STEVEN MICHAEL	FOX, JUHANI ALLEN	MALLAS, NICHOLAS A.	SPEARS, JOYE L.
BARRON, SHANE WILLIS	FREESE, JESSICA RENEE	MAXWELL, BRANDON S.	SPELLEN, ELIZABETH R.
BARRY, PAUL EDWIN	FULLER, THOMAS WAYNE	MCCLELLAN, RODNEY J.	SPELLEN, GEOFFREY B.
BASHAM, JAMES STEVEN	GALVIN, ELIZABETH MARY	MCGAHEE, LARRY LOUIS	STANTON, CHRISTOPHER S.
BENITO, RICHARD DAVID	GARMON, JASON HAMPTON	MCMILLON, ERICKA D.	STARKS, MARC ANTONY
BETHEL-MAXIE, VAQUISHA	GAYLE, EARL WINSTON	MITCHELL, KEVIN JOSEPH	STEPHENS, GERI SHAMEKA
BEYENE, EUAEL BERHANE	GEORGE, RANDAL LEE	MORGAN, TODD VERNELL	STEWART, RONNIE NORRIS
BOATENG, SHERRY DOTSON	GIBBS III, THOMAS DAVID	MOTT, CYNTHIA	STINYARD, KELVIN
BOLLING, KATHERINE DEVORE	GILES, HERBERT F.	MURPHY JR., GREGORY B.	STONE, ALESIA ANDREA
BRAZEMAN, CRAIG PHILIP	GREEN, ANJENAI G.	MURRAH, JUANQUALO D.	STONE, RODNEY DAVID
BRIDGET, KAYLA DENISE	GREEN, MELBA JANI	NEWSOM, JESSICA FALLON	SWINDLE, FRANK L.
BRILEY, DONNIE CHAPPELLE	GREENWAY, KIMBERLY B.	NICHOLS, JEAN GRINWIS	SWINGER, INA LYNN
BRYANT, SHEMAKA ROCHELLE	GRIMSHAW, SHANE KELLE	NICHOLS, LATHAN OTTO	TASSAW, BERHANE BEYENE
BUNCH, KIM	HABTEMARIAM, NEYOU	NOLEN, MILTON LEE	THOMAS, JEFFREY ALAN
BUTTS, KIMBERLY LYNN	HANDLEY, WILEY D.	O'LEARY, CHRISTINE L.	THOMPSON, VANESSA
BYER, EDMOND JOHN	HARRIS, PARKS WAYNE	PALMER, ALITA SHARISSE	THRASH, NANCY M.
CABRERA-ANDERSON, SANDY	HASSAN, MUHSIN SHAHID	PANNELL, NICOLE D.	TORT, HENRY
CHASTAIN, MICHAEL ALAN	HASSAN, MUHSIN SHAHID	PARKER, ATARI LARAE	TROY, DOUGLAS ADAM
CHESLER, ROSETTA L.	HIGHSMITH, AMOS MATTHEW	PERLSON, MARC DAMON	TURNER, TRAVIS DAVON
CHILDRESS, CLIFTON	HIGHTOWER, ANTHONIO	PHELAN, CHRISTINE	VELASQUEZ, JULIUS O.
CLEMMONS, JOYCE YVONNE	HILL, HOLLIS JEROME	PHELAN, ROSS	WALKER WHISBY, KATARA
CLINE, TRAVIS DANIEL	HILL, LISA WILSON	RANSOME, MAURICE L.	WASHINGTON, SABRINA A.
COCHRANE, BABETTE DAWN	HINDSMAN, CHERROD TER-RAY	RECKERDREES, THOMAS NMN	WATT II, ROOSEVELT
COOK, CHRIS LAMAR	HINES, JAMES WILLIAM	REDDICK, DEREK LAMAR	WEBBER, MELINA MARY
CUNNINGHAM, SALLY K.	HORTON, CHRISTOPHER TODD	REYES, REAGAN J.	WEEKS, FRANCES MARIAN
DALMAN, JONATHAN B.	HORTON, MALACHI	RHODES, KATHRYN DENISE	WEST, ERIC NOEL
DAMBACH-CIRKO, PATRICIA J.	HUDSON, HAKIMAH B.	RICHARDSON, CLARK	WILLIAMS, JACK LELAND
DANIELS, SONIA L.	HUDSON, KYLE W.	RICHARDSON, LEROY	WINKLEMAN, NAN L.
DAVIDSON, DANNY DOUGLAS	HUGULEY, CK ADONNI	RIVERS, MICHAEL THOMAS	WOLFE, LISA LYNN
DAVIDSON, MITCHELL T.	HUMPHREY, JOVIERA Y.	ROBBINS, KAREN FELICIA	WRIGHT, CHRISTOPHER K.
DAY, DUANE DAVIDSON	IRVINE, XAVIER ANTOINE	ROBINSON, JEROY	
DEVAUGHN, CARL LINTON	JACKSON II, ANTHONY	RUDDOCK, LEOPOLD ERIC	
DOLBIER, JEFFREY ALAN	JAMES, FRANK HUGH	RUDDOCK, MARGARET A.	
EARTHRISE, ROCHELLE D.	JENKINS, STEPHANIE D.	SADLER JR., JOHN THURSTON	
ECHOLS, ERIC DWIGHT	JOHNSON, EARL CHARLES	SANDERS, SHAKILLA TERIA	
ECHOLS, PATRICIA IZETTA	JOHNSON, MICHAEL TODD	SAXON, JASMINE NICHOLE	
ELLIOTT, MAURICE	KAHSSU, HAILE TANKEY	SAXON, RASHAD LAMAR	



be appointed and authorized to serve as Permanent Process Servers for the calendar year of 2022, without the necessity of an order for appointment in each individual case.

SO ORDERED, this 1st day of January, 2022.

*Susan E. Edlein*

Chief Judge Susan E. Edlein  
 State Court of Fulton County

May 24, 2022

To: All Judges, Clerks of Court, and Counsel

From: Thelma Wyatt Moore, Esquire

Re: Sixth Amended Notice of Leave of Absence for 2021-2022

**NOTICE OF LEAVE OF ABSENCE**

Comes now, Thelma Wyatt Moore, and respectfully notifies all judges before whom she has cases pending, all affected clerks of court, and all opposing counsel, that she will be on leave pursuant to Georgia Uniform Court Rule 16.

The period of Leave during which time Applicant will be away from the practice of law is:

- a. June 2, 3, 6, 7, 8, 9 & 10<sup>th</sup> 2022. (Family Celebration)
- b. July 5, 6, 7, 8, 11, 12 & 13<sup>th</sup> 2022. (Family Celebration)
- c. August 12, 15, 16, 17, 18 & 19<sup>th</sup> 2022. (Medical)
- d. September 1, 2, 6, 7, 8 & 9<sup>th</sup> 2022. (Gate City Bar Conference)
- e. December 6, 7, 8 & 9<sup>th</sup> 2022 (Personal)

The purpose of this Leave is for continuing education, medical and personal vacation.

All affected judges and opposing counsel shall have ten (10) days from the date of this notice to object to it. If no objections are filed, the leave shall be granted.

Respectfully submitted this 24<sup>th</sup> day of May, 2022.

/s/ Thelma Wyatt Moore  
THELMA WYATT MOORE, ESQ  
Georgia Bar No. 779300

Moore Law LLC  
3285 Main Street  
Atlanta, Georgia 30337  
(O) 404-699-6001  
(F) 866-257-5052  
(C) 678-472-1372  
Email: tmoore@moore-legal.com

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the foregoing Notice of Leave of Absence upon all judges, clerks, and opposing counsel by via email, where available.

Respectfully submitted this 24<sup>th</sup> day of May, 2022.

/s/ Thelma Wyatt Moore  
THELMA WYATT MOORE, ESQ  
Georgia Bar No. 779300

Moore Law LLC  
3285 Main Street  
Atlanta, Georgia 30337  
(O) 404-699-6001  
(F) 866-257-5052  
(C) 678-472-1372  
Email: tmoore@moore-legal.com

June 1st, 2022

To: All Judges, Clerks of Court, and Counsel

From: Thelma Wyatt Moore, Esquire

Re: Seventh Amended Notice of Leave of Absence for 2022

1. Case # 2022CV364619 - Thelma Wyatt Moore and Moore Law, LLC VS. Yvonne Tompkins
2. Case # 17CH9685 - Afari I. Richards, ex rel. VS. Sonia E. Dasouza
3. Case # 2019CV326010 - Blue Star Kitchen, Inc. Dba Ubar, Carl Williams VS. Harry Bowden, City of East Point
4. Case # 2019CV326399 - Thelma Wyatt Moore, as Executor of the Estate of Yvonne Fortson, and Armentris Davis VS. Wilmington Savings Fund Society, FSB, D/B/A Christiana Trust, Not Individually but As Trustee for Pretium Mortgage Acquisition Trust
5. Case # 2021CV345657 - Desta Taylor VS. Benjamin Martin
6. Case # 2018CV310594 - Tina Howard VS. Eddie Howard, Jr.
7. Case # 2018CV30670 - Wanda Cooper VS. Liberty Mutual, Claudia Janka, Direct Insurance
8. Case # 2021CV346111 - Desta Taylor VS. Benjamin Martin
9. Case # 2020CV339849 - Thelma Wyatt Moore VS. Antwion Thompson, Grady Memorial Hospital Corporation
10. Case # 17FM4627 - Livingston Richards VS. Sonia Eucrise Dasouza
11. Case # 2017CV299516 - Kester Uzochukwu VS. Nmaobi Uzochukwu
12. Case # 2022CV361631 - Everett Gay, Prestige Learning, LLC VS. Angelia Gay-Bankston, Angel's Paradise Higher Learning Academy INC.
13. Case # 2020CV342846 - Danielle Bryant VS Micah Bryant
14. Case # 17CR016500Y - State of Georgia VS. Marvin Dudley
15. Case # 2018CV305664 - Angelia Gay-Bankston, and Angel's Paradise Higher Learning Academy, Inc VS. Everett Gay, and Prestige Learning, LLC
16. Case # 19EV000002 - Matthew Rice, Renee Coleman VS. City of Atlanta, Nathaniel Fripp, Sr.
17. Case # 2016CV273869 - Georgia Power Company VS. Charles Johnson, Colorado Capital Investments, Inc., Midland Funding LLC, AmeriCredit Financial Services, Inc., Crescent Bank & Trust, Arthur Ferdinand, Pinkie Toomer, Any and All Others Who Hold Or Who Claim Any Interests In The Property Described, Parcel No. 050
18. Case # 2021CV350242 - Angelia Bankston, Angel s Paradise Higher Learning Center, Inc VS. Everett Gay, Prestige Learning, LLC
19. Case # 2021CV350292 - Angelia Bankston, Angel s Paradise Higher Learning Center, Inc VS. Everett Gay, Prestige Learning, LLC

20. Case # 2021CV350184 - Angelia Bankston, Angel s Paradise Higher Learning Center, Inc VS. Everett Gay, Prestige Learning, LLC
21. Case # 2021CV350119 - J. Herbert Williams VS. Ditech Holding Corporation
22. Case # 19EV006104 - Larshell Curley v. Sunshine Parking, LLC, et al.
23. Case # 19EV001407 - Sandra Lanier, James Lanier VS. City of Atlanta
24. Case # 2021CV355409 - Gregory Wilson VS. Madolyn Andrews
25. Case # 2021CV351511 - Jaccob Thomas VS. Ashley V. Thomas
26. Case # 21SC178350 - The State of Georgia VS. Deja Colbert
27. Case # 22EV002513 - Theresa Martin Johnson VS. The Kroger Co.
28. Case # 2022CV360594 - Racquel Vannberg VS. Fredrik Vannberg
29. Case # 2021CV351535 - Larshell Curley VS. Rodney McCrae
30. Case # 15CV12528 - IN RE: Georgette Peterson (DB)
31. Case # 21FM10376 - Patrice Jeannite VS. Jean Jeannite
32. Case # 2015CV265132 - City of Atlanta, Georgia VS. Williams S Sams, Richard Mendoza, Cathy Hampton, Douglas J Macginnitie, Jeff S Haymore, Charles L Johnson, Fulton County Probate Court
33. Case # 19EV003455 - Yvonne Tompkins v. Madelaine Matthews
34. Case # 2021 – 1950 - Lynitta Thomas-Watson
35. Case # 2019CV319149 - Earnest LaGrone, Sr. VS. Nicole LaGrone
36. Case # 18SC161769 - The State of Georgia VS. Corbin Hines
37. Case # 17SC154508 - The State of Georgia VS. Corbin Hines
38. Case # 21MS150974 - Capital One Bank (USA), N.A. vs. Khari Cummings
39. Case # 2020CV337229 - Bilal Little VS. Jessica Sherard
40. Case # 2021CV348167 - Israel Vishkovski, and Flowmax Holdings, LLC VS. City of East Point, and Antavius Weems
41. Case # 19EV000590 - Donna Portas, Larry Garland VS. Peter Manickas, Advantage Rent A Car LLC
42. Case # 2020CV342516 - Olujimi Brown VS. Farrah Brown
43. Case # 2019CV324430 - Antwion Joseph Thompson VS. Cawana Lowe and Clear Blue Insurance
44. Case # 2020CV333070 - Equity Trust Company Custodian FBO 200243116 IRA VS. 1086 West Avenue SW, Tenant/owner/occupant, Rosie Calhoun, Unknown Heirs at Law of Rosie Lee Calhoun, James Calhoun, Unknown Heirs at Law of James Calhoun, Thelma Todd, Fulton County Tax Commissioner, City of Atlanta, Unknown Parties with Any Interest in The Subject Property

45. Case # 2019CV315878 - Sixth District Episcopal AME Church, Henry Porter, Cynthia Cody VS. Allen Temple Developments, Inc., Henry Adams, Jesse Echols, Ruth Pace, Issac Scott
46. Case # 2019CV321048 - Ronda L Wilcox VS. Curtis L Wilcox
47. Case # 19C28326 - State VS Alysa Armstrong-Gibbs
48. Case # 19C28245 - State VS Alysa Armstrong-Gibbs
49. Case # 2019CV316324 - Bradford Richie VS. Valisia Lippitt
50. Case # 19CR1874 - State of Georgia VS. Livingston Richards
51. Case # 2016CV283856 - Quinnes Parker VS. Leah Steele Barnett
52. Case # 2019CV320845 - Travis Walker VS. Adina Torres
53. Case # 2019CV328719 - Kelvin Lockhart VS. Tierra Lockhart
54. Case # 2010CS02728 - Georgia State Department of Human Resources Ex Rel VS Stanley R Jones
55. Case # 18EV001984 - Blossom Gates VS. Aminata Lamin
56. Case # 19-A-06690-8 – Ward VS. Bodkin
57. Case # 16A62435 - Kevin Ross, Kevin Ross Public Affairs, LLC, The Law Practice of Kevin A. Ross, LLC, Kevin Ross Political Consulting Group, LLC., Jeffrey Walker, Robert James, William Nix, Paul Champion d/b/a Champion Tree Services, Dion Allen
58. Case # 2015CV264444 - Bradford Richie VS. Valisia Richie
59. Case # 2016CV272983 - Timothy McClendon VS. Tunisa Cloud
60. Case # 2018CV302284 - Tina Howard VS. Eddie Howard, Jr.
61. Case # 2018CV301144 - Melvonique Mitchell VS. Shawn Mitchell
62. Case # 2018CV304425 - Philip Alan Bashaw VS. Gladys Powell, Arthur F Powell
63. Case # 2018CV301983 - Olujimi Brown VS. Farrah Brown
64. Case # 2009CV164059 - Richard Winfrey vs. Rashida Winfrey
65. Case # 17SC154647 - The State of Georgia VS. Corbin Hines
66. Case # 2015CV259463 - David Hanks VS. Karen Hanks
67. Case # 2018CV301162 - James Roberts, II. VS. Althea Roberts
68. Case # 16EV002711 - Darnell Duling VS. Megabus Southeast, Greenwich Insurance Company
69. Case # 2017CV299270 - Zahra Mas VS. Quante Strickland
70. Case # 2017CV298106 - Walter Ward VS. Sonia Bodkin
71. Case # 2016CS014914 - The Georgia Department of Human Resources Ex Rel Amari Diallo VS. Tchaka Diallo
72. Case # 2016CV277004 - Richard Winfrey VS. Rashida Winfrey

73. Case # 2016CS015066 - The Georgia Department of Human Resources Ex Rel Jacob Henderson VS. Shawn Henderson
74. Case # 2016CV271811 - Samantha Sinclair and Michael Johnson VS. Alonzo Ramey and Metropolitan Atlanta Rapid Transit Authority
75. Case # 15A55812E3 - Kevin Ross VS. Robert James Dekalb County Da
76. Case # 2017CV292387 - Nmaobi A Uzochukwu VS. Kester Uzochukwu
77. Case # 2017CV292693 - Johnny Cooks VS. Janice Cooks
78. Case # 17EV003183 - Erica Garvin, Bryson McAllister VS. TriBridge Residential, LLC, Abbey Residential Services, Inc.
79. Case # 2017CV288031 - Donna Wilkerson VS. Jerry Wever
80. Case # 2017CV291850 - MELVONIQUE MITCHELL VS. Shawn Mitchell
81. Case # 15EV004429 - Jernese Simpson VS. Conterro Harris, Earlene Bannister
82. Case # 16MS080532 - Thelma Moore vs. Robert Patterson
83. Case # 2016CV270427 DONNA WILKERSON VS. JERRY WEVER
84. Case # 2016CV274139 - Dennis Zleh VS. Tammy McPherson
85. Case # 15EV003321 - Woodrow Key VS. Jason Grandison, Broderick Jones
86. Case # 16EV0011038 - Charnele Guillaume VS. Megabus Southeast, Greenwich Insurance Company
87. Case # 2016CV272145 - Johnny Cooks VS. Janice Cooks
88. Case # 15EV003289 - Shannon Miller VS. Riccardo Bates, Kenneth Hardea
89. Case # 2015CV265352 - Monica Parker VS. Faron Hill
90. Case # 2013CV226912 - Buffy Bacon vs. Michael Anthony Davis Jr.

### **NOTICE OF LEAVE OF ABSENCE**

Comes now, Thelma Wyatt Moore, and respectfully notifies all judges before whom she has cases pending, all affected clerks of court, and all opposing counsel, that she will be on leave pursuant to Georgia Uniform Court Rule 16.

The period of Leave during which time Applicant will be away from the practice of law is:

- a. June 2, 3, 6, 7, 8, 9 & 10<sup>th</sup> 2022. (Family Celebration)
- b. July 1, 2, 3, 4, 5, and 6<sup>th</sup>. 2022. (Family Celebration)
- c. July 12, 13, and 14<sup>th</sup>. (Conference)
- d. August 12, 15, 16, 17, 18 & 19<sup>th</sup> 2022. (Medical)
- e. September 1, 2, 6, 7, 8 & 9<sup>th</sup> 2022. (Gate City Bar Conference)
- f. December 6, 7, 8 & 9<sup>th</sup> 2022 (Personal)

The purpose of this Leave is for continuing education, medical and personal vacation.

All affected judges and opposing counsel shall have ten (10) days from the date of this notice to object to it. If no objections are filed, the leave shall be granted.

Respectfully submitted this 1<sup>st</sup> day of June, 2022.

/s/ Thelma Wyatt Moore  
THELMA WYATT MOORE, ESQ  
Georgia Bar No. 779300

Moore Law LLC  
3285 Main Street  
Atlanta, Georgia 30337  
(O) 404-699-6001  
(F) 866-257-5052  
(C) 678-472-1372  
Email: tmoore@moore-legal.com

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the foregoing Notice of Leave of Absence upon all judges, clerks, and opposing counsel by via email, where available.

Respectfully submitted this 1<sup>st</sup> day of June, 2022.

/s/ Thelma Wyatt Moore

THELMA WYATT MOORE, ESQ

Georgia Bar No. 779300

Moore Law LLC

3285 Main Street

Atlanta, Georgia 30337

(O) 404-699-6001

(F) 866-257-5052

(C) 678-472-1372

Email: tmoore@moore-legal.com